

**CRIMINAL DUTY COVER SHEET**  
**For Northern District of California Magistrate Judges**

**Target (Def. Name, Phone No., Address, etc.):** Bennie Powell Jr., Jonae Dickson, Carolyn Powell

**Judge:** Hon. Kim      **Date:** 11/18/2020      **Time Dropped Off:** \_\_\_\_\_ AM / PM

**Type and Number of Document(s):**

<input checked="" type="checkbox"/> Arrest Warrant(s) (# <u>3</u> )	<input type="checkbox"/> Search Warrant(s) (# _____)
<input type="checkbox"/> Search Warrant Extension(s) (# _____)	<input type="checkbox"/> Pen Register(s)/Trap & Trace(s) (# _____)
<input type="checkbox"/> Pen Register/Trap & Trace Extension(s) (# _____)	<input type="checkbox"/> Stored Communications Act/Toll Record(s) (# _____)
<input type="checkbox"/> Non-Disclosure Order(s) (# _____)	<input type="checkbox"/> Pole camera(s) (# _____)
<input checked="" type="checkbox"/> Summons(es) (# <u>1</u> )	<input type="checkbox"/> Other <b>Motion to Seal Documents</b> (# <u>1</u> )

**Complete all applicable information; check box for who will pick up completed document:**

*If documents will be picked up by different people, please use separate cover sheets.*

AUSA: Yoosun Koh

Office Telephone Number: 415-436-7034      Mobile Number: 415-377-6159

Duty AUSA Name/Number: \_\_\_\_\_  
*Include if AUSA assigned to case is not available today.*

Agent: USPIS Postal Inspector Sukhdeep Singh

Office Telephone Number: 415-550-5704      Mobile Number: 415-314-5080

Paralegal/Other: Daniel Fuentes

Telephone Number: 415-436-7003

**Date and time arrest or search is planned, if applicable:** \_\_\_\_\_

**When document is needed:**

*Please do not write "ASAP." Provide specific deadline and explanation, or write "not urgent."*

Not urgent

**Is SEALING requested?** YES      **Is this a DELAYED NOTICE warrant?** No  
**Is this a RESUBMISSION?** No      **For resubmissions, previous judge's initials:** \_\_\_\_\_

Judge's Remarks: \_\_\_\_\_ (*preparer should not write in this area*)

Contact affiant to come in. |  Signed, call to pick up. |  Denied. |  Other:

Date/Time out: \_\_\_\_\_ AM / PM

**UNITED STATES DISTRICT COURT**  
 for the  
 Northern District of California

United States of America

v.

BENNIE POWELL JR.  
 JONAE DICKSON  
 CAROLYN POWELL

)  
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 )  
 )  
 )  
 )

Case No.3:20-mj-71681 MAG

*Defendant(s)*

**FILED**

Nov 19 2020

SUSAN Y. SOONG  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 9/19/2019 to 11/29/2019 in the county of San Francisco in the  
Northern District of California, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 1349

Conspiracy to commit bank fraud (Bennie Powell Jr., Jonae Dickson, Carolyn Powell)  
 Max. Penalties: 30 years' imprisonment, 5 years' supervised release,  
 \$1,000,000 fine, \$100 special assessment, forfeiture.

18 U.S.C. 1028A(a)(1)

Aggravated Identity Theft (Bennie Powell Jr.)  
 Penalty: Mandatory minimum sentence of 2 years' imprisonment, to run  
 consecutively to the punishment provided for the predicate felony.

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

/s/ Sukhdeep Singh

*Complainant's signature*

Approved as to form /s/ Yoosun Koh  
AUSA Yoosun Koh

Sukhdeep Singh, USPIS Postal Inspector

*Printed name and title*

Sworn to before me by telephone.

*Judge's signature*

Date: November 18, 2020

City and state: San Francisco, CA

Hon. Sallie Kim, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR COMPLAINT**

I, Sukhdeep Singh, a Postal Inspector with the U.S. Postal Inspection Service (“USPIS”), being duly sworn, state:

**INTRODUCTION**

1. This affidavit is made in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a criminal complaint against Bennie James POWELL JR., Jonae Laposha DICKSON, and Carolyn Sharane POWELL; an arrest warrant authorizing the arrest of Bennie POWELL JR.; an arrest warrant authorizing the arrest of Jonae DICKSON; and an arrest warrant and summons for Carolyn POWELL, for the violations of federal criminal law identified below.

**Count One: Title 18, United States Code, Section 1349**

2. From at least on or about September 2019 up to and including at least on or about November 2019, in the Northern District of California and elsewhere, Bennie POWELL JR., Jonae DICKSON, Carolyn POWELL, and others known and unknown, willfully and knowingly conspired and agreed together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

3. It was a part and object of the conspiracy that, Bennie POWELL JR., Jonae DICKSON, Carolyn POWELL, and others known and unknown, willfully and knowingly would and did execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false or fraudulent pretenses, representations, and promises, in

violation of Title 18, United States Code, Section 1344.

4. Bennie POWELL JR. participated in the scheme and, in furtherance of the conspiracy and to effect the illegal object thereof, on or about November 18, 2019, he knowingly executed a scheme to defraud Wells Fargo, which was then insured by the Federal Deposit Insurance Corporation, by depositing at least five stolen and forged United States Postal Service (“USPS”) money orders, which were stolen from the USPS in New York and never validly issued, at a Wells Fargo branch located in San Francisco, in the Northern District of California .

5. Wells Fargo and the other banks at which Bennie POWELL JR., Jonae DICKSON, and Carolyn POWELL deposited stolen and forged postal money orders are financial institutions that were then insured and are currently insured by the Federal Deposit Insurance Corporation.

6. The banks lost money as a result of the defendants’ scheme to defraud.

Count Two: Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2

7. On or about November 18, 2019, in the Northern District of California, Bennie POWELL JR. knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, 1028A(c), to wit, Bennie POWELL JR. used a counterfeit driver license that contained his own photograph but the name and date of birth of a third party without their knowledge or consent, and without legal authority, to deposit at least five stolen and forged postal money orders at Wells Fargo bank in San Francisco, during and in relation to the conspiracy to commit bank fraud charged in count one of this complaint.

**SOURCES OF INFORMATION**

8. This affidavit is submitted for the limited purpose of securing a criminal

complaint, three arrest warrants, and a summons. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts necessary to establish probable cause that violations of the federal laws identified above have occurred.

9. I have based my statements in this affidavit on my training and experience, personal knowledge of the facts and circumstances obtained through my participation in this investigation, information provided by other agents and law enforcement officers, including officers from the Vallejo Police Department (“VPD”), information provided by reports prepared by other agents and law enforcement officers, and information provided by records and databases. Where I refer to conversations and events, I often refer to them in substance and in relevant part rather than in their entirety or verbatim, unless otherwise noted. This affidavit also reflects my current understanding of facts relating to this investigation, but my understanding may change in the future as the investigation proceeds.

#### **AFFIANT BACKGROUND**

10. I am a United States Postal Inspector employed by the USPIS, the federal law enforcement arm of the United States Postal Service. I have been so employed since April 2016. Prior to becoming a postal inspector, I served in the USPS for approximately eleven years in various management positions.

11. I am currently assigned to the San Francisco Division Contraband Interdiction and Investigation Team, based in Richmond, CA, and have been so assigned since October 2020. I was previously assigned to the San Francisco Mail Theft and External Crimes Team, which investigates crimes against the USPS and attacks on, and the misuse of, the U.S. mail system. Such crimes include theft of mail, access device fraud, identity theft, assaults, robberies, and burglaries.

12. I have completed Basic Postal Inspector’s Training, a twelve-week federal law

enforcement training course, which includes instruction on the criminal investigation of mail theft, mail fraud, identity theft, internet crimes, assaults, robberies, burglaries, and prohibited mailings (such as narcotics). During my employment as a postal inspector, I have participated in investigations involving mail theft, identity theft, access device fraud, check fraud, assaults, robberies, and burglaries. I have interviewed witnesses and cooperating individuals, and worked with veteran postal inspectors, federal criminal investigators, and police detectives on investigations.

#### **APPLICABLE STATUTES**

13. Title 18, United States Code, Section 1349 states that “[a]ny person who attempts or conspires to commit any offense under this chapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.”

14. Title 18, United States Code, Section 1344 provides that “[w]hoever knowingly executes, or attempts to execute, a scheme or artifice (1) to defraud a financial institution; or (2) to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises; shall be fined no more than \$1,000,000 or imprisoned not more than 30 years, or both.”

15. Title 18, United States Code, Section 1028A(a)(1) provides that “[w]hoever, during and in relation to any felony violation enumerated in subsection (c), knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person shall, in addition to the punishment provided for such felony, be sentenced to a term of imprisonment of 2 years.”

16. Section 1028A(c)(5) expressly states that a “felony violation enumerated in subsection (c)” includes “any offense that is a felony violation of any provision contained in chapter 63 (relating to mail, bank, and wire fraud).” A violation of 18 U.S.C. § 1349, which is a statute contained in chapter 63, is a predicate felony offense for purposes of charging a violation of 18 U.S.C. § 1028A(a)(1).

17. Title 18, United States Code, Section 1028(d)(7)(A) defines the term “means of identification” to include “any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including any name, social security number, date of birth[.]”

#### **FACTS SUPPORTING PROBABLE CAUSE**

##### **A. Overview of Postal Money Orders and the Conspiracy**

18. USPS postal money orders can be purchased at any United States Post Office in an amount up to \$1,000 U.S. dollars. Postal money orders (“PMO”) contain a unique serial number that is pre-printed on each postal money order. PMO contain blank lines for the name and address of the sender, as well as the payee, of the postal money order. When a customer purchase a postal money order at a post office, the USPS clerk prints the date of purchase, post office code, a number identifying the clerk, and amount of the purchase on the money order. The customer fills in the name and address information for the sender and payee.

19. The charges in this complaint relate to a scheme in which POWELL JR. purchased stolen USPS postal money orders through end-to-end encrypted channels or chat forums on Telegram Messenger App. The blank PMO were originally stolen by third party individuals from USPS post offices in New York. They were then falsely “issued” by an intermediary who printed the blank PMO with dates, zip codes, clerk number, and dollar

amounts, usually \$900 or \$1,000 (the maximum amount for a money order). POWELL JR. purchased these stolen and forged PMO and filled in the name and address of the sender, as well as the name and address of the payee. He typically wrote his own name or the name of a third party in the payee section and then cashed/deposited the stolen and forged PMO either in his own name or in the name of the third party at post offices and banks in San Francisco and other cities, both in the Northern District of California and outside the District. When POWELL JR. used the names of third parties, he typically presented fraudulent identification in the form of a counterfeit driver license containing his own photograph but the personal identifying information (“PII”) of a third party without the third party’s knowledge or authorization, including the third party’s real name and/or date of birth.

20. The evidence obtained and reviewed by USPIS further demonstrates that POWELL JR. recruited and conspired with other individuals, namely DICKSON and Carolyn POWELL to cash stolen and forged PMO, which were stolen from USPS post offices in New York and never validly issued, at post offices and banks located in the Northern District of California and elsewhere. DICKSON cashed at post offices and deposited at banks stolen and forged PMO, both in her own name and in the name of third party, and used a counterfeit driver license containing her own photograph but the PII of a third party without the individual’s knowledge or authorization to execute the fraudulent transactions. Carolyn POWELL typically deposited stolen and forged PMO into her own bank account, and then withdrew the funds. She then gave the funds to POWELL JR., who in turn paid her a portion of the funds.

21. On November 22, 2019, USPIS postal inspectors and VPD officers executed a state search warrant at POWELL JR.’s residence in Vallejo, California, and seized various items of contraband along with two cellular phones belonging to POWELL JR. and his girlfriend who

will be referred to herein as “S.B.” On August 7, 2020, I executed a search of the two seized cellular phones pursuant to a federal search warrant issued by this Court.

22. My review of evidence from the search of POWELL JR.’s residence and two phones provide the basis for many of the facts contained in this affidavit.

**B. Bennie POWELL JR., Jonae DICKSON, and Carolyn POWELL Conspired to Cash Stolen and Forged PMO at Post Offices and Banks.**

**1. POWELL JR. Cashed/Deposited at Post Offices and Banks Stolen and Forged PMO in his Own Name at Post Offices and Banks.**

23. On or about May 24, 2019, POWELL JR. used his own California driver license to cash two stolen and forged PMO at Richmond Main Post Office and Richmond Mira Vista Station, respectively, which are both located in Richmond in the Northern District of California. POWELL JR. listed his girlfriend, S.B. in the “From” section of the money orders. On May 31, 2019, POWELL JR. deposited two more PMO at the Richmond Main Post Office. This time, he used a counterfeit California driver license to obtain money.

24. A review of USPS records revealed that between June 6, 2019 and November 1, 2019, POWELL JR. deposited an additional five stolen and forged PMO into a Wells Fargo bank account ending in 3884 at various Wells Fargo bank ATMs in Vallejo, California<sup>1</sup> and the Wells Fargo – 16th Street SF Branch located in San Francisco, California. Wells Fargo records indicated that this account belongs to POWELL JR. As explained in further detail below, during the search of POWELL JR.’s residence on November 22, 2019, postal inspectors seized a receipt for a PMO that was cashed in the amount of \$900; this receipt was attached to a Wells Fargo bank deposit receipt dated October 29, 2019 for a bank account ending in 3884.

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<sup>1</sup> Vallejo is located in the Eastern District of California.

25. The following table summarizes the PMO cashed or deposited by POWELL JR. in his own name for a total loss amount of approximately \$8,700. A review of the serial numbers of all of the PMO cashed by POWELL JR. indicated that they were stolen from the USPS in New York and never validly issued.

PMO Serial #	Post Office/ Bank	Amount	Cashed	Date
25840581816	Richmond Main Post Office <sup>2</sup>	\$1,000	Yes	05/24/2019
25840581827	Richmond Mira Vista Station <sup>3</sup>	\$1,000	Yes	05/24/2019
25840582503	Richmond Main Post Office	\$1,000	Yes	05/31/2019
25840582536	Richmond Main Post Office	\$1,000	Yes	05/31/2019
25840562051	Wells Fargo Bank via ATM deposit from Vallejo Safeway <sup>4</sup>	\$1,000	Yes	06/06/2019
25840562062	Wells Fargo Bank via ATM deposit from Vallejo Safeway	\$1,000	Yes	06/06/2019
26254646504	Wells Fargo Bank – Vallejo Branch <sup>5</sup>	\$900	Yes	10/29/2019
26254646447	Wells Fargo Bank – 16 <sup>th</sup> Street SF Branch <sup>6</sup>	\$900	Yes	10/30/2019
26254648923	Wells Fargo Bank – 16 <sup>th</sup> Street SF Branch	\$900	Yes	11/01/2019

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<sup>2</sup> USPS Richmond Main Post Office is located at 1025 Nevin Ave, Richmond, CA 94801.

<sup>3</sup> USPS Richmond - Mira Vista Station is located at 12651 San Pablo Ave, Richmond, CA 94805.

<sup>4</sup> ATM in Vallejo Safeway is located at 122 Robles Way, Vallejo, CA 94591.

<sup>5</sup> Wells Fargo Bank – Vallejo Branch is located at 1702 Tennessee St, Vallejo, CA 94590.

<sup>6</sup> Wells Fargo Bank – 16th Street SF Branch is located at 3027 16th St, San Francisco, CA 94103.

**2. Powell Cashed or Attempted to Cash Stolen and Forged PMO at Post Offices Using a Counterfeit Driver License that Contained Stolen PII from a Victim Called B.M.**

26. On or about October 11, 2019, POWELL JR. went to the San Francisco Post Office – Sutter Station and cashed a stolen and forged PMO in the amount of \$900. POWELL JR. presented a counterfeit California driver license in the name of an individual who will be referred to herein as “B.M.” to cash the money order. The license contained a photograph of POWELL JR. but B.M.’s PII, including B.M.’s name, address and date of birth.

27. On or about October 15, 2019, POWELL JR. went to the San Francisco Post Office – Mission Station and cashed another stolen and forged PMO in the amount of \$900. POWELL JR. again presented the counterfeit driver license in the name of B.M. to cash the PMO.

28. I later reviewed surveillance video footage from the Sutter Station and Mission Station post offices and identified POWELL JR. as the individual who cashed the two money orders on October 11 and October 15, respectively. My identification of POWELL JR. was based on my personal interaction with POWELL JR. during the execution of the search warrant at his residence as well as the photo of POWELL JR. on record with the California Department of Motor Vehicles. A copy of the counterfeit driver license in the name of B.M. and still images from the video footage of POWELL JR. at the Sutter Station and Mission Station post offices are depicted below.



29. Based on my review of USPS records, I believe that POWELL JR. cashed an additional 15 stolen and forged PMO in the name of B.M. at various post offices located in San Francisco between September 26 and October 18, 2019. Each time, he used the same counterfeit driver license in the name of B.M. to cash the PMO. POWELL attempted to cash another stolen and forged PMO in the amount of \$900 at San Francisco Post Office – Bryant Station on October 11, 2019, but a postal retail clerk found the PMO to be suspicious and refused to process the transaction due to ongoing fraud involving PMO.

30. The total loss amount from the 17 successful transactions is approximately \$15,300. A review of the serial numbers of all of the PMO cashed by POWELL JR. in the name of B.M. indicated that they were stolen from the USPS in New York and never validly issued. A table summarizing the fraudulent transactions is shown below:

PMO Serial #	Post Office/ Bank	Amount	Cashed	Date
26254634027	San Francisco Post Office - Bryant Station <sup>7</sup>	\$900	Yes	09/26/2019
26254634038	San Francisco P&DC – Finance Station <sup>8</sup>	\$900	Yes	09/26/2019

<sup>7</sup> San Francisco Post Office – Bryant Station is located at 1600 Bryant St, San Francisco, CA 94103

<sup>8</sup> San Francisco Processing & Distribution Center (P&DC) – Finance Station is located at 1300 Evans Ave, San Francisco, CA 94188.

26254634062	San Francisco P&DC – Finance Station	\$900	Yes	09/28/2019
26254634073	San Francisco Post Office – Bryant Station	\$900	Yes	09/28/2019
26254634084	San Francisco Post Office – Mission Station <sup>9</sup>	\$900	Yes	09/28/2019
26254634477	San Francisco Post Office – 18 <sup>th</sup> Street Station <sup>10</sup>	\$900	Yes	10/05/2019
26254634490	San Francisco Post Office – Steiner Station <sup>11</sup>	\$900	Yes	10/05/2019
26254634501	San Francisco Post Office – Pine Street Station <sup>12</sup>	\$900	Yes	10/05/2019
26254634973	San Francisco Post Office – Fox Plaza Station <sup>13</sup>	\$900	Yes	10/10/2019
26254648078	San Francisco Post Office – Sutter Station <sup>14</sup>	\$900	Yes	10/10/2019
26254634545	San Francisco Post Office – Sutter Station	\$900	Yes	10/11/2019
26254634995	San Francisco Post Office – Mission Station	\$900	Yes	10/11/2019
26254648012	San Francisco Post Office – 18 <sup>th</sup> Street Station	\$900	Yes	10/11/2019

<sup>9</sup> San Francisco Post Office – Mission Station is located at 1198 S Van Ness Ave, San Francisco, CA 94110.

<sup>10</sup> San Francisco Post Office – 18<sup>th</sup> Street Station is located at 4304 18th St, San Francisco, CA 94114.

<sup>11</sup> San Francisco Post Office – Steiner Station is located at 1849 Geary Blvd, San Francisco, CA 94115.

<sup>12</sup> San Francisco Post Office – Pine Street Station is located at 1400 Pine St, San Francisco, CA 94109.

<sup>13</sup> San Francisco Post Office – Fox Plaza Station is located at 1390 Market St, San Francisco, CA 94102.

<sup>14</sup> San Francisco Post Office – Sutter Station is located at 150 Sutter St, San Francisco, CA 94104.

26254648427	San Francisco Post Office - Bryant Station	\$900	No	10/11/2019
26254648451	San Francisco Post Office – Mission Station	\$900	Yes	10/12/2019
26254648440	San Francisco Post Office – Mission Station	\$900	Yes	10/15/2019
26254634850	San Francisco Post Office – 18 <sup>th</sup> Street Station	\$900	Yes	10/17/2019
26254648438	San Francisco Post Office – Sutter Station	\$900	Yes	10/18/2019

**3. POWELL JR. Deposited or Attempted to Deposit Stolen and Forged PMO at Wells Fargo Using a Counterfeit Driver License that Contained Stolen PII from a Victim Called T.S.**

31. On or about November 14, 2019, POWELL JR. opened a checking account ending in 6347 in the name of an individual who will be referred to herein as “T.S.” at a Westamerica Bank branch in Vallejo, California. POWELL JR. identified himself as T.S. and provided T.S.’s PII, including T.S.’s name, date of birth and social security number. He used a counterfeit Georgia driver license in T.S.’s name, but containing POWELL JR.’s photograph and listing POWELL JR.’s home address in Vallejo, California. I have reviewed the surveillance video footage from Westamerica Bank on this date and identified the individual in the video as POWELL JR. based on POWELL JR.’s photograph in his actual driver license and his prior booking photographs as well as my own interaction with POWELL JR. on November 22, 2019. Later on the same day, November 14, 2019 POWELL JR. returned to the Westamerica Bank – Vallejo Branch and deposited two stolen and forged PMO into the account ending in 6347, each of which was made out to T.S. in the amount of \$1,000. POWELL JR. later withdrew the funds.



Surveillance video footage of POWELL JR. at the Westamerica Bank – Vallejo Branch on November 14, 2020.

32. On or about November 15, 2019, POWELL JR. returned to the same Westamerica Bank branch in Vallejo and deposited three additional stolen and forged PMO, each in the amount of \$1,000, into the account ending in 6347. POWELL JR. again presented the counterfeit driver license in the name of T.S. Westamerica Bank contacted the USPS Money Order Verification unit and was informed that the three PMO were not valid.

33. All five of the PMO were endorsed in the name of T.S. A redacted copy of the front side of one of the PMO that POWELL JR. deposited on November 14, 2020 is shown below:



34. On or about November 15, 2019, POWELL JR. went to the Westamerica Bank branch located in Benicia, California and attempted to deposit additional stolen and forged PMO. The Benicia branch declined to process the transactions due to the prior fraudulent transactions at the Vallejo branch. On or about November 18, 2019, the Westamerica Bank – Fairfield branch

declined to process three PMO that POWELL JR. attempted to deposit. Westamerica Bank reported this information to the USPIS and provided video surveillance of POWELL JR. and account documentation.

35. Still images of POWELL JR. from the surveillance video footage at the Benicia Branch on November 15 and Fairfield branch on November 18 are shown below. Law enforcement officers recovered the hooded sweatshirt shown in the photographs below at POWELL JR's residence.



POWELL JR. at the Benicia branch on or about November 15, 2019.



POWELL JR. at the Fairfield branch on or about November 18, 2019.

36. POWELL JR. also deposited forged and stolen PMO into a Wells Fargo account in the name of T.S. During their search of POWELL JR.'s residence, postal inspectors recovered a Wells Fargo deposit receipt dated November 14, 2019 for a checking account ending in 1342. A review of Wells Fargo records revealed that a checking account ending in 1342 was opened at

the Wells Fargo branch in Vallejo, California on or about November 14, 2019 in the name of T.S. According to the consumer account application form and signature card for this Wells Fargo account ending in 1342, the individual who opened this account provided T.S.'s full name, T.S.'s date of birth, T.S.'s social security number, and POWELL JR.'s home address in Vallejo, California. A counterfeit driver license in the name of T.S. was also used to open the account. The information listed on the bank signature card for the Wells Fargo checking account ending in 1342 matches the PII that POWELL JR. provided to Westamerica Bank – Vallejo Branch to open a Westamerica Bank checking account ending in 6347 on the same day. Furthermore, the same signature in the name of T.S. is found on the Westamerica Bank records, Wells Fargo records, and the PMO that were deposited into the two checking accounts in the name of T.S. Based on this information, I believe that POWELL JR. opened the Wells Fargo checking account ending in 1342 in the name of T.S.

37. A review of Wells Fargo records further revealed that on or about November 18, 2019, POWELL JR. deposited five stolen and forged PMO made out to T.S., each in the amount of \$1,000, into the Wells Fargo bank account ending in 1342 at the Wells Fargo – 16th Street SF Branch in San Francisco. He presented the same counterfeit driver license, containing POWELL JR.'s photograph but T.S.'s name and date of birth, which he had used to deposit stolen and forged PMO into the Westamerica Bank account ending in 6347.

38. A review of the serial numbers of all the PMO deposited by POWELL JR. in the name of T.S. at Westamerica Bank and Wells Fargo indicated that they were stolen from the USPS in New York and never validly issued. The total loss amount associated with these fraudulent transactions is approximately \$10,000. The table below summarizes the fraudulent transactions:

PMO Serial #	Post Office/ Bank	Amount	Cashed	Date
26254673932	Westamerica Bank - Vallejo Branch <sup>15</sup>	\$1,000	Yes	11/14/2019
26254673954	Westamerica Bank - Vallejo Branch	\$1,000	Yes	11/14/2019
26334006074	Westamerica Bank - Vallejo Branch	\$1,000	Yes	11/15/2019
26334006131	Westamerica Bank - Vallejo Branch	\$1,000	Yes	11/15/2019
26334006221	Westamerica Bank - Vallejo Branch	\$1,000	Yes	11/15/2019
26334006197	Westamerica Bank - Fairfield Branch <sup>16</sup>	\$1,000	No	11/18/2019
26334006208	Westamerica Bank - Fairfield Branch	\$1,000	No	11/18/2019
26334006210	Westamerica Bank - Fairfield Branch	\$1,000	No	11/18/2019
26334006693	Wells Fargo Bank – 16 <sup>th</sup> Street SF Branch	\$1,000	Yes	11/18/2019
26334006726	Wells Fargo Bank – 16 <sup>th</sup> Street SF Branch	\$1,000	Yes	11/18/2019
26334006715	Wells Fargo Bank – 16 <sup>th</sup> Street SF Branch	\$1,000	Yes	11/18/2019
26334006546	Wells Fargo Bank – 16 <sup>th</sup> Street SF Branch	\$1,000	Yes	11/18/2019

<sup>15</sup> Westamerica Bank - Vallejo Branch is located at 1660 Tennessee St, Vallejo, CA 94590.

<sup>16</sup> Westamerica Bank - Fairfield Branch is located at 2400 Hilborn Rd, Fairfield, CA 94534.

26334006524	Wells Fargo Bank – 16 <sup>th</sup> Street SF Branch	\$1,000	Yes	11/18/2019
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**4. POWELL JR. Cashed Stolen and Forged Money Orders at Post Offices Using a Counterfeit Driver License that Contained Stolen PII from a Victim Called G.K.**

39. During the search of POWELL JR.’s residence, postal inspectors recovered a counterfeit California driver license containing the PII of an individual who will be referred to herein as “G.K.” and a photograph of POWELL JR. Postal inspectors also recovered a photocopy of the *genuine* driver license in the name of G.K., as well as a counterfeit MoneyGram money order dated November 8, 2019 made out to G.K.

40. I have communicated with a MoneyGram Law Enforcement liaison, who informed me that this MoneyGram money order is counterfeit and MoneyGram records “do not show any MoneyGram agent having sold these money order(s).”

41. The evidence collected in this case suggests that POWELL JR. assumed the identity of G.K. and used the counterfeit driver license in G.K.’s name to cash three stolen and forged PMO at post offices in San Francisco for a total loss amount of \$2,700. A review of the serial numbers of all of the PMO cashed by POWELL JR. in the name of G.K. indicated that they were stolen from the USPS in New York and never validly issued. A summary of the transactions is depicted in the table below:

PMO Serial #	Post Office/ Bank	Amount	Cashed	Date
26254634185	San Francisco Post Office – Mission Station	\$900	Yes	10/02/2019
26254634196	San Francisco P&DC – Finance Station	\$900	Yes	10/02/2019

26254634220	San Francisco Post Office – Bayview Station <sup>17</sup>	\$900	Yes	10/02/2019
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**5. POWELL JR. Cashed Stolen and Forged PMO at Post Offices Using a Counterfeit Driver License that Contained Stolen PII from a Victim Called C.G.**

42. During the search of POWELL JR.’s residence, postal inspectors recovered an overwhelming amount of indicia documents in the name of an individual who will be referred to herein as “C.G.” including two FedEx Express envelopes containing a total of 20 stolen and forged blank<sup>18</sup> PMO in the amount of \$1,000 each; a US Bank receipt dated November 4, 2019 for an account ending in 2746; and a US Bank debit card ending in 3074 in the name of C.G. The potential loss to the USPS from the recovered blank PMO is approximately \$20,000. A photograph of the seized PMO is shown below:




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<sup>17</sup> San Francisco Post Office – Bayview Station is located 2111 Lane St, San Francisco, CA 94124.

<sup>18</sup> The term ‘blank’ herein refers to the fact that ‘From’ and ‘To’ sections of these recovered money orders were not filled out yet. These money orders were stolen from New York post office(s).

43. Based on my review of bank records for US Bank account ending in 2746, this account and the associated debit card ending in 3074 were opened on October 28, 2019 in the name of C.G. Additionally, the records suggest that POWELL JR. opened a US Bank cash VISA signature card ending in 2881 in the name of C.G. The address and primary contact phone number listed for the three accounts are POWELL JR.'s own home address in Vallejo, California and the phone number registered to POWELL JR.'s cellular phone that was seized during the search of his residence.

44. US Bank also provided surveillance video footage from its Vallejo branch, which shows POWELL JR. at the branch location on or about November 4, 2019. On or about this date, POWELL JR. used a debit card ending in 3074 in the name of G.C. to conduct a \$2,100 cash withdrawal from the account ending in 2746. Law enforcement officers recovered a receipt for this transaction from POWELL JR.'s residence. I identified POWELL JR. as the suspect shown on the surveillance video based on my personal interaction with POWELL JR. at his residence on November 22, 2019, as well as the photo of POWELL JR. on record with the California Department of Motor Vehicles. POWELL JR. signed the name of C.G. on the withdrawal slip for this transaction.



A still image from US Bank – Vallejo Branch video surveillance footage showing POWELL JR., who conducted a \$2,100 cash withdrawal from an account ending in 2746 and registered to C.G.

45. Based on my review of postal records, evidence recovered from POWELL JR.'s residence, and US Bank records, I have determined that POWELL JR. cashed the following stolen and forged PMO in the name of C.G. using a counterfeit California driver license at various post offices located in San Francisco between October 4, 2019 and October 18, 2019. He also cashed a stolen and forged PMO in Reno, Nevada. A review of the serial numbers of all of the PMO cashed by POWELL JR. in the name of C.G. indicated that they were stolen from the USPS in New York and never validly issued. As shown in the table below, the total loss amount associated with these fraudulent transactions is approximately \$6,300.

PMO Serial #	Post Office/ Bank	Amount	Cashed	Date
26254634411	San Francisco Post Office – Bryant Station	\$900	Yes	10/04/2019
26254634422	San Francisco Post Office – Pine Street Station	\$900	Yes	10/04/2019
26254634466	San Francisco Post Office – 18 <sup>th</sup> Street Station	\$900	Yes	10/04/2019
26254634916	San Francisco Post Office – Pine Street Station	\$900	Yes	10/08/2019
26254634927	San Francisco Post Office – Gateway Station <sup>19</sup>	\$900	Yes	10/08/2019
26254634938	San Francisco Post Office – 18 <sup>th</sup> Street Station	\$900	Yes	10/08/2019
26254648855	Reno Post Office – Downtown Station <sup>20</sup>	\$900	Yes	10/18/2019

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<sup>19</sup> San Francisco Post Office – Gateway Station is located at 1 Embarcadero Ctr, San Francisco, CA 94111.

<sup>20</sup> Reno Post Office – Downtown Station is located at 135 N Sierra St, Ste A1, Reno, NV 89501.

46. Accordingly, there is probable cause to believe that from at least in or around May 2019 up to and including at least in or around November 2019, POWELL JR. successfully cashed at post offices and deposited at banks in the Northern District of California and elsewhere no fewer than 46 stolen and forged PMO in his own name as well as in the names of B.M., T.S., G.K., and C.G. POWELL JR. used at least four counterfeit driver licenses containing his own photograph but the PII of B.M., T.S., G.K., and C.G., including their names and/or dates of birth, to conduct these fraudulent transactions at banks and post offices. All of these PMO were stolen from the USPS in New York and were never validly issued. In addition, for the reasons set forth below, there is probable cause to believe that POWELL JR. conspired with DICKSON and Carolyn POWELL to commit bank fraud, in violation of 18 U.S.C. § 1349.

47. There is also probable cause to believe that POWELL JR. also committed the crime of aggravated identity theft, in violation of 18 U.S.C. § 1028A(a)(1), in the Northern District of California. Specifically, on or about November 18, 2019, POWELL JR. used without lawful authority a counterfeit driver license in the name of T.S., which contained a photograph of POWELL JR. but the PII of T.S., including T.S.'s real name and date of birth, to deposit five stolen and forged postal money orders at Wells Fargo – 16<sup>th</sup> Street SF Branch in San Francisco, California, during and in relation to the conspiracy to commit bank fraud.

**6. DICKSON Cashed at Post Offices and Deposited at Banks Stolen and Forged Money Orders in her Own Name and in the Name of a Third Party Using a Counterfeit Driver License that Contained Stolen PII from a Victim Called K.T.**

48. During the search of POWELL JR.'s residence, postal inspectors seized a completed but not yet cashed money order in the amount of \$1000. The PMO was made out to Jonae DICKSON at an address located in San Francisco. I found an exact match for DICKSON and her address in law enforcement databases, and obtained a copy of DICKSON's driver license

and prior booking photographs. I also knew that a female suspect had recently used a counterfeit California driver license in the name of an individual who shall be referred to herein as “K.T.” to cash stolen and forged PMO at various post offices in San Francisco. I identified DICKSON as the female suspect based on a visual comparison between DICKSON’s booking photograph and the photograph in the counterfeit driver license. DICKSON’s physical characteristics match those of the individual in the photograph in the counterfeit driver license and the persons shown in the two photographs have the same distinctive neck tattoo that starts with the letter “J.” Additionally, during their search of POWELL JR.’s cellular phone, postal inspectors found a passport-sized photograph of DICKSON in his phone images.

49. Based on my search of POWELL JR.’s cellular phone, I learned that during the period in or around September 2019 to in or around November 2019, POWELL JR. and DICKSON texted each other multiple times about creating counterfeit driver licenses using stolen PII of individuals without their knowledge or consent, which they would then use to cash or deposit stolen and forged PMO. Below are relevant excerpts from text messages between DICKSON and POWELL JR.

50. On September 19, 2019, DICKSON texted POWELL JR.:

DICKSON:	K.T. <sup>21</sup> 95820	<b>Redacted</b>	ca
DICKSON:	G.K. <sup>22</sup> eyes bl	<b>Redacted</b>	ca 93941 brown '0"

On September 21, 2019, POWELL JR. and DICKSON exchanged the following messages:

<sup>21</sup> The actual text message contained K.T.’s full name.

<sup>22</sup> The actual text message contained G.K.’s full name.

POWELL JR.: You got that face  
DICKSON: Yes I'm meeting Courtney in the o for the blanks  
POWELL JR.: Ok I'm on my way out there

51. Based on my training, experience, and knowledge of this investigation, I believe that DICKSON and POWELL JR. shared the personal identifying information of K.T. and G.K., and this information was later used to produce counterfeit driver licenses for the purpose of cashing stolen and forged PMO. I believe POWELL JR. was referring to a counterfeit ID when he said, "You got that face."

52. In October 2019, POWELL JR. and DICKSON discussed via text messages where to cash stolen and forged PMO at various post offices in San Francisco.

On October 4, 2019, POWELL JR. and DICKSON exchanged the following text messages:

POWELL JR.: Which post office you went too  
DICKSON: 1st street by the pier  
POWELL JR.: Yup  
POWELL JR.: Post office on Evans  
DICKSON: ok  
DICKSON: Why you getting go to the pier  
POWELL JR.: Trying this one on pine real fast  
DICKSON: Ok  
POWELL JR.: Wanna meet at that one?  
DICKSON: Don't go to the one on market  
DICKSON: Yea  
POWELL JR.: Ok

DICKSON: Way  
POWELL JR.: Leaving goin to Bryant one  
DICKSON: Ok  
DICKSON: Ima meet you at the Bryant on send me the address  
POWELL JR.: 1600 Bryant st  
DICKSON: Ok  
POWELL JR.: Good on 18th too  
DICKSON: It's this same lady that helped me before  
DICKSON: Ok  
POWELL JR.: Goin to Evans  
DICKSON: Ok only one teller had 900

On October 15, 2019, POWELL JR. and DICKSON shared the following messages:

POWELL JR.: You went to the one by yo house  
DICKSON: On my way there now  
POWELL JR.: They got it in south van ness  
DICKSON: Ok  
DICKSON: I'm at the one in concord  
POWELL JR.: Ok  
DICKSON: She tryna verify it  
POWELL JR.: Leave  
DICKSON: She got it  
POWELL JR.: Tell her  
DICKSON: Ok

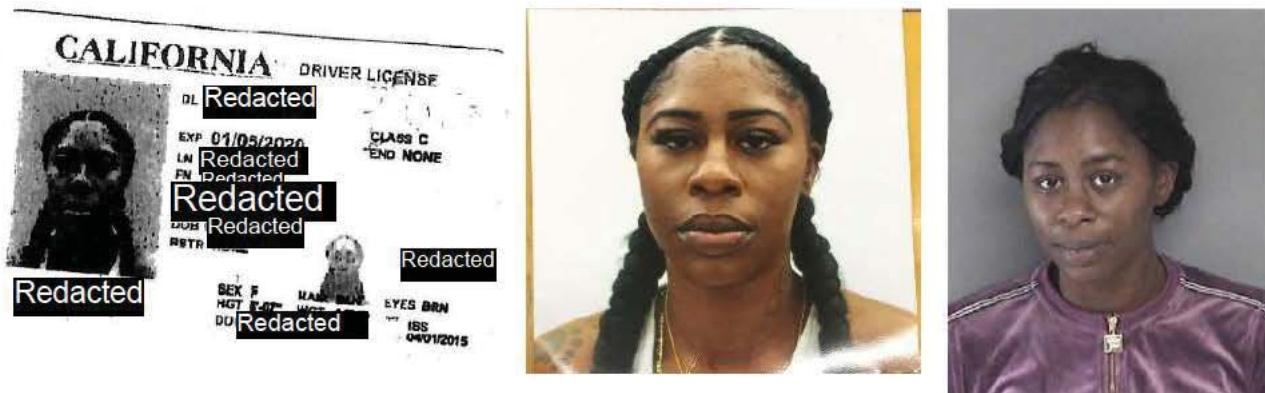
POWELL JR.: You gone  
DICKSON: Leaving now  
POWELL JR.: Come out here  
DICKSON: Ok  
DICKSON: She cashed it  
POWELL JR.: Ok  
POWELL JR.: Packed smh  
DICKSON: You know they got money  
POWELL JR.: Hopefully they ain't on bs  
DICKSON: Wya  
POWELL JR.: Sutter

53. Based on my training, experience, and knowledge of this investigation, I believe that DICKSON and POWELL JR. exchanged the aforementioned text messages as they were going around to various post offices in the city of San Francisco to cash stolen and forged PMO. When DICKSON texted, "She tryna verify it," she was likely referring to a postal clerk who was attempting to call the money order verification line to find out whether or not a particular money order was validly issued by USPS. The dates of the text messages correspond to the dates on which DICKSON and POWELL JR. used counterfeit driver licenses to cash stolen and forged PMO in San Francisco.

54. A review of USPS records revealed that on or about October 14, 2019, DICKSON attempted to cash a stolen and forged PMO in the amount of \$900 at the San Francisco Post Office – Mission Station. DICKSON presented a counterfeit driver license in K.T.'s name that included K.T.'s PII, including as her real name and date of birth, but containing a photograph of DICKSON. A postal retail clerk determined the PMO to be suspicious due to ink discoloration,

and denied the transaction due to ongoing fraud involving PMO. The postal clerk made a copy of the stolen and forged PMO and the counterfeit driver license used by DICKSON. I identified the person in the photograph in the counterfeit driver's license as DICKSON based on a comparison with DICKSON's photograph in her actual driver license and prior booking photographs.

55. A review of PMO cashed in the name K.T. revealed that DICKSON presented the same counterfeit driver license in the name of K.T. to cash PMO at various post offices and banks in San Francisco, in the Northern District of California, and elsewhere. All of these PMO were stolen from the USPS in New York and never validly issued. Based on my review of records, I have verified that K.T. is a real person, and DICKSON used a counterfeit driver license containing K.T.'s real name and date of birth. Copies of the counterfeit driver license used by DICKSON, the passport-sized photograph of DICKSON used to produce the counterfeit driver license, and a booking photograph of DICKSON are depicted below:



56. The total loss amount associated with all of the stolen and forged PMO that DICKSON cashed/deposited in the name of K.T. is approximately \$18,900. The table below summarizes the fraudulent transactions:

PMO Serial #	Post Office/ Bank	Amount	Cashed	Date
26254634152	San Francisco Post Office – Rincon Finance Station <sup>23</sup>	\$900	Yes	10/02/2019
26254634174	San Francisco Post Office – Excelsior Branch <sup>24</sup>	\$900	Yes	10/02/2019
26254634433	San Francisco Post Office – Pine Street Station	\$900	Yes	10/04/2019
26254634444	San Francisco P&DC – Finance Station	\$900	Yes	10/04/2019
26254634455	San Francisco Post Office – Airport Station <sup>25</sup>	\$900	Yes	10/04/2019
26254634488	San Francisco Post Office – Rincon Finance Station	\$900	Yes	10/04/2019
26254634512	San Francisco Post Office – Pine Street Station	\$900	Yes	10/08/2019
26254634894	San Francisco Post Office – Rincon Finance Station	\$900	Yes	10/08/2019
26254634940	San Francisco Post Office – 18 <sup>th</sup> Street Station	\$900	Yes	10/08/2019
26254634523	San Francisco Post Office – Gateway Station	\$900	Yes	10/08/2019
26254634905	San Francisco Post Office – Rincon Finance Station	\$900	Yes	10/10/2019
26254634602	USPS - Pittsburg, CA	\$900	Yes	10/11/2019

<sup>23</sup> San Francisco Post Office – Rincon Station is located at 180 Steuart St, San Francisco, CA 94105.

<sup>24</sup> San Francisco Post Office – Excelsior Branch is located at 15 Onondaga Ave, San Francisco, CA 94112.

<sup>25</sup> San Francisco Post Office – Airport Station is located at 660 W Field Rd, San Francisco, CA 94128.

26254634117	San Francisco Post Office – Excelsior Branch	\$900	Yes	10/12/2019
26254646054	San Francisco Post Office – Mission Station	\$900	No	10/14/2019
26254648383	Concord – Casa Correo Post Office <sup>26</sup>	\$900	Yes	10/15/2019
26254648394	San Francisco Post Office – Visitation Station <sup>27</sup>	\$900	Yes	10/15/2019
26254648405	San Francisco Post Office – Excelsior Branch	\$900	Yes	10/15/2019
26254634534	Wells Fargo – San Francisco Branch	\$900	Yes	10/16/2019
26254646032	Reno Post Office – Washington Station <sup>28</sup>	\$900	Yes	10/18/2019
26254648866	Sparks Post Office (NV) <sup>29</sup>	\$900	Yes	10/18/2019
26254648416	Wells Fargo – San Francisco Branch	\$900	Yes	10/18/2019
26254646043	Wells Fargo – San Francisco Branch	\$900	Yes	11/29/2019

57. DICKSON also deposited several stolen and forged PMO into a JPMorgan Chase Bank account in her own name. She opened a Chase account ending in 9900 on May 10, 2019 in the name of Jonae Laporsha Dickson. She provided her address of record and the phone number

<sup>26</sup> Concord – Casa Correo Post Office is located at 4494 Treat Blvd, Concord, CA 94521.

<sup>27</sup> San Francisco Post Office – Visitation Station is located at 68 Leland Ave, San Francisco, CA 94134.

<sup>28</sup> Reno Post Office – Washington Station is located at 1490 Stardust St, Reno, NV 89503.

<sup>29</sup> Sparks Post Office is located at 750 4th St, Sparks, NV 89431.

she used to text with POWELL JR. as her primary contact number. DICKSON deposited five stolen and forged PMO into this account ending in 9900 on November 20, 2019. She withdrew \$4,600 from her account the next day. On December 4, 2019, the PMO were returned as altered or fraudulent. All of these PMO were stolen from the USPS in New York and never validly issued. The table below summarizes the details of the five PMO that DICKSON deposited in her own name, for a total loss amount of approximately \$5,000.

PMO Serial #	Post Office/ Bank	Amount	Cashed	Date
26334006535	JP Morgan Chase Bank – Pittsburg Branch <sup>30</sup>	\$1,000	Yes	11/20/2019
26334006660	JP Morgan Chase Bank – Pittsburg Branch	\$1,000	Yes	11/20/2019
26334006671	JP Morgan Chase Bank – Pittsburg Branch	\$1,000	Yes	11/20/2019
26334006682	JP Morgan Chase Bank – Pittsburg Branch	\$1,000	Yes	11/20/2019
26334006704	JP Morgan Chase Bank – Pittsburg Branch	\$1,000	Yes	11/20/2019

58. Accordingly, there is probable cause to believe that DICKSON cashed at post offices and deposited at banks in the Northern District of California and elsewhere no fewer than 26 stolen and forged PMO in her own name as well as in the name of K.T. There is also probable cause to believe that POWELL JR. and DICKSON conspired to commit bank fraud, in violation of 18 U.S.C. § 1349.

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<sup>30</sup> JP Morgan Chase – Pittsburg Branch is located at 2136 Railroad Ave, Pittsburg, CA 94565.

**7. Carolyn POWELL Cashed Stolen and Forged Money Orders at a Wells Fargo Bank in San Francisco, California.**

59. During the search of POWELL JR.'s residence, postal inspectors seized a Wells Fargo bank deposit receipt dated November 15, 2019 for an account ending in 1783 in the amount of \$5,000. According to Wells Fargo records, this account was opened on September 13, 2019 in the name of Carolyn POWELL.<sup>31</sup> As summarized in the table below, between November 6, 2019 and November 15, 2019, Carolyn POWELL deposited a total of ten stolen and forged PMO into her Wells Fargo bank account ending in 1783. A review of the serial numbers of the PMO cashed by Carolyn POWELL on or about November 6, 2019 and November 15, 2019 indicated that they were all stolen from the USPS in New York and never validly issued. The total loss amount associated with these transactions is approximately \$10,000.

<b>PMO Serial #</b>	<b>Wells Fargo Account #</b>	<b>Amount</b>	<b>Cashed</b>	<b>Date</b>
26254673752	Ending in 1783	\$1,000	Yes	11/06/2019
26254673831	Ending in 1783	\$1,000	Yes	11/06/2019
26254673820	Ending in 1783	\$1,000	Yes	11/06/2019
26254673818	Ending in 1783	\$1,000	Yes	11/06/2019
26254673741	Ending in 1783	\$1,000	Yes	11/06/2019
26254673730	Ending in 1783	\$1,000	Yes	11/15/2019
26254673537	Ending in 1783	\$1,000	Yes	11/15/2019
26254673976	Ending in 1783	\$1,000	Yes	11/15/2019
26254673987	Ending in 1783	\$1,000	Yes	11/15/2019

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<sup>31</sup> Carolyn POWELL is POWELL JR.'s sister.

26254673728	Ending in 1783	\$1,000	Yes	11/15/2019
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60. I reviewed surveillance video footage from the Mission Ocean Avenue branch of Wells Fargo bank that shows Carolyn POWELL at the location on November 15, 2019. I identified the individual shown in the video as Carolyn POWELL based on a comparison with Carolyn POWELL's photograph in her driver license and her prior booking photographs. A still image from the video showing Carolyn POWELL is below:



61. A review of POWELL JR.'s cellular phone records uncovered text messages between POWELL JR. and Carolyn POWELL in which they discussed cashing stolen and forged PMO. On or about November 15, 2019, they exchanged text messages that included the following excerpt:

POWELL JR.:	You wanna buy theses 5?
C. POWELL:	No not really i spent to much money this past week...
C. POWELL:	What you trying to sell them for
POWELL JR.:	Was go get wat I paid I didn't really make nothing wen I do it with you

C. POWELL: Huh how

C. POWELL: You doing it again you a make your 7

POWELL JR.: I pay 100 off each one wen I fuk with other ppl

C. POWELL: You wanna give me what you give people for they can get out your hands

POWELL JR.: I'll give you 200 you my sister

C. POWELL: 16 & potrero

POWELL JR.: Man I'm in sd

C. POWELL: I'm on my way what bank you want to go to

POWELL JR.: Same one on I'm still doin mines

C. POWELL: Ok on my way

POWELL JR.: Wya I gotta go downtown

POWELL JR.: ?

C. POWELL: One not working coming

C. POWELL: It worked

POWELL JR.: Ok

62. Based on my training, experience, and knowledge of this investigation, I believe that on or about November 15, 2019, POWELL JR. asked Carolyn POWELL to deposit stolen and forged PMO into her bank account, and offered to pay her \$200 for each PMO that she cashed. POWELL JR went on to say that he normally pays about \$100 to other people, but he will pay her \$200 because she is his sister. In response, Carolyn POWELL agreed to meet up with him for the purpose of negotiating PMO. A review of Wells Fargo records for Carolyn POWELL's account ending in 1783 revealed that she deposited five PMO in the amount of

\$1,000 each at the Wells Fargo – Mission Ocean Avenue branch in San Francisco on November 15, 2019. She confirmed the transactions by texting POWELL that “[i]t worked.”

63. Accordingly, there is probable cause to believe that Carolyn POWELL deposited no fewer than ten stolen and forged PMO at a Wells Fargo bank branch located in San Francisco, in the Northern District of California. There is also probable cause to believe that POWELL JR. and Carolyn POWELL conspired to commit bank fraud, in violation of 18 U.S.C. § 1349.

**C. Vallejo Police and USPIS Executed a Search Warrant on POWELL JR.’s Residence.**

64. On or about November 21, 2019, a state search warrant was issued authorizing a search of the home address in Vallejo, California that POWELL JR. provided to Westamerica Bank. The next day, VPD officers and USPIS postal inspectors (collectively, “officers”) executed the warrant. As the officers entered the residence, a man, who was later identified as POWELL JR., fled the residence on foot through the back patio door. Officers pursued POWELL JR. and ultimately detained and identified him.

65. Officers searched the residence and found indicia that POWELL JR. and S.B. lived there. They also seized the following items, among others, during their search of the residence:

- a. Two FedEx envelopes addressed to C.G. at POWELL JR.’s residential address, containing a total of 20 stolen and forged blank PMO, each printed in the amount of \$1,000;
- b. US Bank card ending in 3074 in the name of C.G., and US Bank receipt for account ending in 2746;
- c. A completed, but not cashed, stolen and forged PMO made out to DICKSON;
- d. A stolen and forged PMO that was later determined to have been deposited in a Wells Fargo bank account in POWELL JR.’s name;

- e. Bank transaction receipts from Wells Fargo, Bank of America, US Bank, and JPMorgan Chase, among others, relating to the deposit of stolen and forged PMO;
- f. Western Union money order and money transfer receipts;
- g. A counterfeit MoneyGram money order in the amount of \$1,000 made out to G.K.;
- h. Indicia documents in the name of T.S., C.G., G.K., and personal identifying information of other identity theft victims;
- i. Three counterfeit driver licenses, including a license in the name of G.K. (containing a photograph of POWELL JR.);
- j. A FedEx envelope containing Westamerica Bank records and a transaction receipt dated November 14, 2019 for an account ending in 6347, which POWELL JR. opened on or about November 14, 2019 in the name of T.S.;
- k. A book titled “The Master Guide to New Identity”;
- l. A Compact Disk labelled “Identity Theif” [sic]; and
- m. A black hooded sweatshirt with red Nike logo, black jeans, and black Nike jacket with white Nike logos on the sleeves.<sup>32</sup>

66. Images of various items recovered from POWELL JR.’s residence are depicted below for reference.

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<sup>32</sup> Surveillance video footage showed that POWELL JR. wore these items of clothing when he conducted some of the fraudulent transactions.



67. I searched POWELL JR.’s and S.B.’s cellular phones pursuant to a federal warrant. POWELL JR.’s cellular phone records revealed that he was using a Telegram Messenger App to communicate with an unknown user to purchase stolen and forged blank PMO. Additionally, POWELL JR. participated in several encrypted private forums on Telegram, in which individuals discussed, purchased, and sold illicit products and services related to counterfeit currency, identify theft, bank fraud, bust-out schemes, and stolen checks and money orders.

68. POWELL JR.’s cellular phone also contained stolen personal identifying information of five or more individuals, including C.G., B.M., G.K., and K.T. POWELL JR. and DICKSON used the stolen information to open bank accounts and cash stolen and forged PMO in the name of these identity theft victims. Additionally, there were numerous screenshots of dark web sites containing personal identifying information of other identity theft victims.

69. I also found on POWELL JR.’s cellular phone text messages with an unknown individual, identified only as “Face Man” in POWELL JR.’s contacts list. The text messages revealed that POWELL JR. purchased at least four counterfeit driver licenses from Face Man,

including a counterfeit driver license in the name of K.T. using DICKSON's photograph and a counterfeit driver license in the name of G.K. using POWELL JR.'s photograph. On November 20, 2019, POWELL JR. sent Face Man an image of approximately 20 stolen PMO and ten counterfeit MoneyGram money orders and asked Face Man if he could make a counterfeit ID for the state of Ohio. Face Man responded, "Yeap all 50 states."

**REQUEST TO SEAL AFFIDAVIT, CRIMINAL COMPLAINT,  
AND ARREST WARRANT**

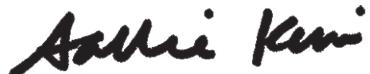
70. Based on my training and experience, disclosure of the existence of this affidavit, the complaint, the arrest warrants, the summons, and related documents may cause the targets or other co-conspirators unknown at this time to destroy evidence or conceal ongoing criminal activity, jeopardizing the progress of the ongoing investigation. I therefore request that the Court seal this affidavit, the complaint, the arrest warrants, the summons, and related documents.

**CONCLUSION**

71. On the basis of my participation in this investigation and the information summarized above, there is probable cause to believe that between on or about September 2019 and on or about November 2019, in the Northern District of California and elsewhere, Bennie POWELL JR., Jonae DICKSON, and Carolyn POWELL conspired to commit bank fraud, in violation of 18 U.S.C. § 1349. In addition, there is probable cause to believe that Bennie POWELL JR. also committed the crime of aggravated identity theft, in violation of 18 U.S.C. § 1028A(a)(1), in the Northern District of California.

*/s/ Sukhdeep Singh*  
\_\_\_\_\_  
Sukhdeep Singh  
USPIS Postal Inspector  
United States Postal Inspection Service

Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim.P. 4.1 and 4(d) on this 18 day of November, 2020.



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HONORABLE SALLIE KIM  
UNITED STATES MAGISTRATE JUDGE